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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

SAMUEL SULLIVAN, JR.,

Defendant

CRIMINAL NO. TDC21CR460

(Bank Robbery, 18 U.S.C. § 2113(a);
Interference and Attempted Interference
with Interstate Commerce by Robbery,
18 U.S.C. § 1951(a); Use, Carry, and
Brandish a Firearm During and in
Relation to a Crime of Violence, 18
U.S.C. § 924(c); Forfeiture, 18 U.S.C.
§§ 924(d) and 981(a)(1)(C), 21 U.S.C.
§ 853(p), 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE
(Bank Robbery)

The Grand Jury for the District of Maryland charges that:

On or about April 14, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did by force, violence and intimidation, take from the person and presence of employees of a bank, that is, a Wells Fargo branch located in Potomac, Maryland, the deposits of which were then insured by the Federal Deposit Insurance Corporation, any property and money and any other thing of value, that is, approximately \$3,600 in United States currency, belonging to and in the care, custody, control, management and possession of said bank.

18 U.S.C. § 2113(a)

COUNT TWO
(Bank Robbery)

The Grand Jury for the District of Maryland further charges that:

On or about May 3, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did by force, violence and intimidation, take from the person and presence of employees of a bank, that is, a Wells Fargo branch located in Potomac, Maryland, the deposits of which were then insured by the Federal Deposit Insurance Corporation, property and money and any other thing of value, that is, approximately \$9,573 in United States currency, belonging to and in the care, custody, control, management and possession of said bank.

18 U.S.C. § 2113(a)

COUNT THREE
(Bank Robbery)

The Grand Jury for the District of Maryland further charges that:

On or about May 17, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did by force, violence and intimidation, take from the person and presence of employees of a bank, that is, a SunTrust Bank branch located in Hyattsville, Maryland, the deposits of which were then insured by the Federal Deposit Insurance Corporation, any property and money and any other thing of value, that is, approximately \$8,065 in United States currency, belonging to and in the care, custody, control, management and possession of said bank.

18 U.S.C. § 2113(a)

COUNT FOUR
(Interference with Interstate Commerce by Robbery)

The Grand Jury for the District of Maryland further charges that:

On or about May 26, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did unlawfully obstruct, delay and affect commerce by robbery, as those terms are defined in 18 U.S.C. § 1951, in that the defendant did unlawfully obtain property consisting of United States currency from the presence and person of Victim One, an employee of Business A, located in Hyattsville, Maryland, against the will of that employee by means of actual and threatened force, violence, and fear of injury to the employee.

18 U.S.C. § 1951(a)

COUNT FIVE

(Use, Carry, and Brandish a Firearm and in Relation to a Crime of Violence)

The Grand Jury for the District of Maryland further charges that:

On or about May 26, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did knowingly, intentionally, and unlawfully use, carry, and brandish a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, interference with commerce by robbery and interference with interstate commerce by robbery, in violation of 18 U.S.C. § 1951, as set forth in Count Four of this Indictment, which is incorporated here.

18 U.S.C. § 924(c)(1)(A)(ii) and (c)(1)(C)(i)

COUNT SIX

(Attempted Interference with Interstate Commerce by Robbery)

The Grand Jury for the District of Maryland further charges that:

On or about June 11, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did unlawfully attempt to obstruct, delay and affect commerce by robbery, as those terms are defined in 18 U.S.C. § 1951, in that the defendant did unlawfully attempt to take and obtain property and money, that is, United States currency, from the presence and person of Victims Two and Three, employees of the Sunoco gas station, located in Temple Hills, Maryland, against the will of those employees by means of actual and threatened force, violence, and fear of injury to the employees.

18 U.S.C. § 1951(a)

COUNT SEVEN

(Attempted Interference with Interstate Commerce by Robbery)

The Grand Jury for the District of Maryland further charges that:

On or about June 11, 2021, in the District of Maryland, the defendant,

SAMUEL SULLIVAN, JR.,

did unlawfully attempt to obstruct, delay and affect commerce by robbery, as those terms are defined in 18 U.S.C. § 1951, in that the defendant did unlawfully attempt to take and obtain property and money, that is United States currency, from the presence and person of Victim Four, an employee of Business 2, located in Hyattsville, Maryland, against the will of that employee by means of actual and threatened force, violence, and fear of injury to the employee.

18 U.S.C. § 1951(a)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 924(d) and 981(a)(1)(C), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Counts One through Seven of this Indictment.

Robbery Forfeiture

2. Upon conviction of the offenses set forth in Counts One, Two, Three, Four, Six, and Seven, the defendant,

SAMUEL SULLIVAN, JR.,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses, including, but not limited to, a forfeiture money judgment in the amount of at least \$27,546 in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Firearms and Ammunition Forfeiture

3. Upon conviction of the offense set forth in Count Five of this Indictment, the defendant,

SAMUEL SULLIVAN, JR.,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the offense.

Substitute Assets

4. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

18 U.S.C. § 924(d)
18 U.S.C. § 981(a)(1)(C)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Erek L. Barron / gmm
Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

11/18/21
Date